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5 Attorney for Debtor  
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9 UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA

10 In re:

Case No. 10-59396  
Chapter 7

11 Majid Marhamat

12 REQUEST FOR DEFAULT AND ENTRY OF  
13 ORDER BY DEFAULT ON MOTION TO AVOID  
14 JUDICIAL LIEN UNDER 11 U.S.C. §522 (f)(1)(A)  
(Sohiel Sazesh dba Baywatch Auto Network)

Debtor.  
\_\_\_\_\_/

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16 1. To the clerk: Please enter the default of the claimant or other interested party,  
17 described in paragraph 2(A) below, who have failed to object to or otherwise respond to  
Debtors' Motion herein.

18 2. DECLARATION IN SUPPORT OF REQUEST FOR ORDER BY DEFAULT  
19 ON MOTION TO AVOID JUDICIAL LIEN UNDER 11 U.S.C. §522 (f)(1)(A)(Sohiel Sazesh  
20 dba Baywatch Auto Network):

21 I, Nancy Weng, am the attorney for the Debtor in the above entitled proceeding, have  
22 personal knowledge of the facts herein and can testify competently thereto. I declare the  
following:

23 A. Copies of the MOTION TO AVOID JUDICIAL LIEN UNDER 11 U.S.C. §522  
24 (f)(1)(A)(Sohiel Sazesh dba Baywatch Auto Network): and NOTICE OF MOTION TO AVOID  
25 JUDICIAL LIEN UNDER 11 U.S.C. §522 (f)(1)(A) AND OF OPPORTUNITY TO REQUEST  
26 HEARING (Sohiel Sazesh dba Baywatch Auto Network) were mailed at Glen Ellen, California  
to the claimant at the address indicated hereinbelow were served and filed as follows:

27 DATE OF CERTIFIED MAILING: September 28, 2017  
28

1 ADDRESSED AS FOLLOWS:

2 Sohiel Sazesh dba Baywatch Auto Network  
3 c/o John L. Fallat, Esq.  
4 Law Offices of John L. Fallat  
5 523 Fourth St., #210  
6 San Rafael, CA 94901

7 ECF TRANSMITTED TO:

8 Mohamed Poonja mpoonja@sbcglobal.net, mpoonja@ecf.epiqsystems.com

9 DATE OF FILING: September 28, 2017

10 B. No request for a hearing has been received from the noticed parties identified  
11 hereinabove in paragraph 2(A), above, or from the trustee or any other interested party, by this  
12 moving party.

13 C. A copy of this REQUEST FOR DEFAULT AND ENTRY OF ORDER BY  
14 DEFAULT ON MOTION TO AVOID JUDICIAL LIEN UNDER 11 U.S.C. §522  
15 (f)(1)(A)(Sohiel Sazesh dba Baywatch Auto Network) has been served on the above parties and  
16 the Chapter 13 Trustee as set forth herein below on the attached Certificate of Service by Mail.

17 E. Declarant herein requests entry of default and default ORDER ON MOTION TO  
18 AVOID JUDICIAL LIEN UNDER 11 U.S.C. §522 (f)(1)(A)(Sohiel Sazesh dba Baywatch Auto  
19 Network) against the named creditor.

20 I declare under penalty of perjury under the laws of the State of California that the  
21 foregoing is true and correct and that this Declaration was executed in San Jose, California..

22 Dated: October 26, 2017

23 /s/ Nancy Weng  
24 Nancy Weng, Esq.  
25 Attorney for Debtor

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REQUEST FOR DEFAULT AND ENTRY OF ORDER BY DEFAULT ON MOTION TO AVOID JUDICIAL LIEN UNDER 11 U.S.C. §522 (f)(1)(A) (Sohiel Sazesh dba Baywatch Auto Network).

Sohiel Sazesh dba Baywatch Auto Network  
c/o John L. Fallat, Esq.  
Law Offices of John L. Fallat  
523 Fourth St., #210  
San Rafael, CA 94901

Mohamed Poonja mpoonja@sbcglobal.net, mpoonja@ecf.epiqsystems.com

Dated: October 26, 2017 /s/ Steve Kolkey  
Steve Kolkey